



Rocky Mountain
Remediation Services, L.L.C.
... protecting the environment

DIRECTIVE

PROCEDURE AND DOCUMENT CONTROL

OPS-DIR-004
Revision 0
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1. PURPOSE

The purpose of this directive is to clearly define expectations regarding document control, development of procedures, instructions, and operator aides as well as use of controlled copies and working copies. Issuance of this directive completes the action identified under Task No. 2 for the Movement of Six Drums Action Plan (Memorandum JAH-014-97).

2. SCOPE

The scope of this directive includes defining expectations in developing and controlling documents used during activities conducted within RMRS' Operations. It also includes expectations for the use and control of working copies versus controlled copies of documentation. This directive is applicable to all activities conducted in Operations and to all employees associated with those activities.

3. EXPECTATIONS

Within RMRS, operational procedures/instructions/job aides are written to provide specific direction for operating systems and equipment during normal, abnormal, and emergency conditions. They provide appropriate direction to ensure that the facility and/or system is operated within its authorization basis and within its design specifications. They are key factors affecting the safe performance of systems, processes, and employees within RMRS Operations.

The project manager, and in the case of buildings, the facility or building manager are responsible for the development, implementation, control, and use of procedures, instructions and job aides under their cognizance. Development and control of documentation shall be under the guidelines of Procedure No. QA-05.01, "Preparation and Control of RMRS Documents," and Procedure No. DC-06.01, "Document Control Program."

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To ensure that procedures, instructions and job aides properly address and support safe operation of RMRS facilities and projects, careful attention shall be paid to development, content, revisions, review, and control of these documents. Development of documents shall include the direct involvement of employees familiar with the operation of equipment or system. Their knowledge and expertise applied up-front in the procedural development, as well as their walkdown of draft documents in concert with management involvement, will help ensure a robust and accurate method of controlling operations.

Shift Orders, Operations Orders, and other temporary orders are intended to be used to communicate special needs to Operation's employees such as work priorities, special data-collection requirements, administrative changes, and other similar matters. They are not to be used to change operating procedures. Such changes may be missed by a procedure user. Therefore, information intended to supplement operating procedures or instructions shall be promptly incorporated into the appropriate procedure by completing document modification request (DMR).

Each step in a procedure or instruction which controls or is used to meet an Operational Safety Requirement (OSR), Basis for Operation (BFO) requirement, Technical Specification, or regulatory permit condition shall reference the specific requirement in bold typeface after the step. This aides by providing a tie between the source requirement and the implementation as well as reminding the operator of the source of the procedural step.

A controlled copy of all applicable procedures and instructions shall be maintained in a centralized and controlled area of the project or building for operator reference. Additional selected controlled procedures shall be maintained at other appropriate locations at the direction of the project/building/operations manager. Working copies of procedures shall be available for use during operations. However, since these documents have a limited lifespan, administrative controls shall be implemented to ensure that outdated or uncontrolled procedures are not used.

It is incumbent on management to ensure that employees have properly prepared procedures to use during evolutions and provide timely revisions when issues are raised. Likewise, it is incumbent on employees to use those procedures and when issues arise, help resolve it in a timely manner.